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July 17, 2015

Ref.: 3315446.000-100.710

Ms. Tracey Braun, M.Sc.  
Director, Environmental Approvals  
Manitoba Conservation and Water Stewardship  
2<sup>nd</sup> Floor, 123 Main Street  
Winnipeg MB R3C 1A5

**RE: Environment Act Licence No. 2994, Rural Municipality of Springfield**

MMM Group Limited (MMM) has been retained by the Rural Municipality of Springfield (RM) on June 16, 2015, to coordinate the process of sludge solids removal and land application from the former Oakbank and Dugald wastewater lagoons located at SW03-11-05EPM and NE22-11-05EPM and in accordance with Environmental Act Licence (EAL) No. 2994.

Upon review of the EAL No. 2994, it was determined that the licence shall terminate on the “1<sup>st</sup> Day of December, 2015”. In review of the project objectives, logistics and limitations, completing the land application program before the termination date of December 1, 2015, cannot be achieved. The main constraints to meeting the current deadline are:

- 1) The lagoon cells of both Dugald and Oakbank are fully grown over with bulrushes and reed canary grass. This heavy vegetation cover will need to be removed from the cells prior to land application and this is best accomplished under frozen conditions. The intension is to have the vegetation mechanically removed during the winter prior to land application of the solids to minimize coarse vegetation spread on farm producer fields. The preferred disposal method of the vegetation is to compost the organic material in an approved compost facility; however this method is yet to be confirmed.
- 2) Sludge application contractor in Manitoba is fully booked for 2015 and have almost no availability to complete a large-scale project such as the RM's so the current intension is to schedule the application process with contractor in manner that ensures their availability.

MMM has worked out three land application scenarios. The preferred scenario is outlined below for the anticipated schedule for land application.

Location	Dugald (2 cells)	Oakbank (1 <sup>st</sup> - ½ volume)	Oakbank (2 <sup>nd</sup> - ½ volume)	Risk Management Option
Target Sludge Application Year to Landbase:	Fall 2016	Fall 2017	Fall 2018	Fall 2019
Post Monitoring Year 1	Fall 2017	Fall 2018	Fall 2019	Fall 2020
Post Monitoring Year 2	Fall 2018	Fall 2019	Fall 2020	Fall 2021
Post Monitoring Year 3	Fall 2019	Fall 2020	Fall 2021	Fall 2022

This preferred scenario would allow for risk and financial management that includes:

- By spreading the land application over three years (2016, 2017 and 2018) this allows for better planning for farm producers, application contractors and possible land reuse options.
- Allows the RM to spread their financial cost for land application out over three years instead of one.
- Allows for a Risk Management Option in case of poor weather and/or field conditions that do not allow for land application to occur.

Therefore it is respectfully requested that the termination date of the EAL No. 2994 be extended to the 1<sup>st</sup> Day of December 2022. This allows for three years of post-land application monitoring and reporting after the Risk Management Year Option.

Due to the laps in time since the original Environmental Act Proposal submission there is a need for additional Notice for Alterations submissions to execute this project in a responsible manner. MMM will submit details for these requests in separate documentation however, it is anticipated that the following Notice of Alteration requests may include:

- Notice for new cooperating farm producers and suitable parcels of land.
- Minimize set back distances around residential lots.
- Repeated allocation of biosolids in back to back years, accounting for nutrients and metal loading.
- Revised prescription loading rates based on dry material.

In conclusion, MMM and the RM respectfully request an extension to the termination date of the current licence EAL No. 2994, as outlined above, if there are any further questions or concerns please contact the undersigned directly at: 204-272-2020 or keamd@mmm.ca.

Yours truly,

**MMM Group Limited**



Darren Keam, M.Sc., P.Ag.  
Senior Project Manager  
Environmental Management

Cc: Jim Fenske, Greg Elson and Justin Magne (RM of Springfield)

DK/tc